

**REMARKS/ARGUMENTS**

Claims 1-22 stand rejected in the outstanding Official Action. Independent claim 1 has been amended and therefore claims 1-22 remain in this application.

The Examiner's acknowledgment of Applicants' claim for foreign priority and receipt of the certified copy of the priority document is very much appreciated. Additionally, the Examiner's consideration of Applicants' previously submitted Information Disclosure Statement is appreciated.

On page 2 of the outstanding Official Action, claims 1-7 stand rejected under 35 USC §102 as being anticipated by Ansuini (U.S. Patent 4,780,664). In order to provide proper support for a rejection under the provisions of 35 USC §102, it is incumbent upon the Examiner to establish how and where each and every claimed element and each and every claimed interrelationship between elements is shown in a single reference.

In the present instance, the Ansuini reference does not contain at least two common terminals with "a plurality of corrosive tracks, each of the tracks electrically connected between the at least two common terminals" as in claim 1. Applicants use the word "common" in the ordinary electrical sense, i.e., as can be seen from Applicants' specification and drawings. Figure 1, as discussed on page 4, lines 21-26 of the specification, has two common terminals 8 and 10 with a "plurality of conductive thin film corrosive tracks 16" formed therebetween. Each of the separate tracks 16 electrically connects the two common terminals 12 and 14 and the terminals are "common" to more than one corrosive tracks.

In order to avoid any interpretation that the corrosive tracks did not have to electrically interconnect the two "common" terminals as recited in the original claims, Applicants have

amended claim 1 to specify that "each of the tracks electrically connecting said at least two common terminals."

The Ansuini patent does not contain any disclosure of Applicants' claimed subject matter. As the Examiner will appreciate, in Figures 1 and 2 of the Ansuini reference, two sets of terminals are provided (in Figure 1, terminals 24 and 26 comprise one set of terminals and terminals 20 and 22 provide the other set of terminals). There is only a single corrosive track 18 which electrically connects the two terminals 24 and 26. There is only a single track 16 which interconnects the two terminals 20 and 22. There are no terminals which are "common" to more than one "corrosive track." Therefore, Figure 1 does not disclose "common" terminals which are electrically connected to a plurality of corrosive tracks.

In Figure 2, there are also two pairs of terminals, i.e., outer terminals 62 and 70 which have only a single conductive track 66 interconnecting these two terminals and inner terminals 82 and 90 also having a single conductive track interconnecting those terminals. Just as in Figure 1, Figure 2 of Ansuini has only a single corrosive track electrically connecting any two terminals. As a result, there are no "common" terminals which have a plurality of corrosive tracks electrically interconnecting them. Because Ansuini fails to disclose the subject matter of Applicants' original claim 1 and claim 1 as currently amended, Ansuini cannot serve as a basis for a rejection of claim 1 and claims 2-22 dependent thereon under 35 USC §103.

Claims 8-10 stand rejected under 35 USC §103 as unpatentable over Ansuini in view of Kordecki (EP 0 932 037 A2). Inasmuch as claims 8-10 ultimately depend from claim 1, the above comments distinguishing claim 1 from the Ansuini reference are herein incorporated by reference.

The Examiner's admission that "Ansuini does not disclose a reference sensor that provides a measurable variation in resistivity in response to changes in temperature, which takes the same form as the resistivity sensor and is arranged in an overlapping manner to the resistivity sensor" is very much appreciated. While the Examiner suggests that Kordecki teaches the material admitted not to be included in Ansuini, the Examiner does not allege that Kordecki teaches or discloses Applicants' claimed "plurality of corrosive tracks electrically connecting said at least two common terminals."

Thus, even if Ansuini and Kordecki otherwise taught what the Examiner alleges, the failure of either reference to teach the claimed "**plurality of corrosive tracks** electrically connecting said at least two **common terminals**" evidences the lack of obviousness in view of the Ansuini and Kordecki combination.

Moreover, the Examiner's conclusion that it would be "obvious to modify the Ansuini device" in view of Kordecki is simply nothing more than a hindsight reconstruction taking what the Examiner perceives to be disclosed in Ansuini and modifying it by what the Examiner perceives to be disclosed in Kordecki. Because there is no "reason" or "motivation" for combining these two references, the combination does not meet the test of obviousness set forth by the U.S. Court of Appeals for the Federal Circuit.

Claims 11 and 12 stand rejected under 35 USC §103 as unpatentable over Ansuini in view of Agarwala (U.S. Patent 5,338,432). Inasmuch as claims 11 and 12 ultimately depend from claim 1, the above comments distinguishing claim 1 from the Ansuini reference are herein incorporated by reference.

The Examiner admits that "Ansuini does not disclose a galvanic sensor with at least one corrosive track made of a first metallic material and a thin film track made of a second, different, metallic material. Ansuini also does not disclose corrosive tracks with further tracks arranged in an interdigitated pattern." This admission is very much appreciated.

While the Examiner suggests that Agarwala teaches the material admitted not to be included in Ansuini, the Examiner does not allege that Agarwala teaches or discloses Applicants' claimed "**plurality of corrosive tracks** electrically connecting said at least **two common terminals**." Thus, even if Ansuini and Agarwala otherwise taught what the Examiner alleges, the failure of either reference to teach the claimed "plurality of corrosive tracks electrically connecting said at least two common terminals" evidences the lack of obviousness in view of the Ansuini and Agarwala combination.

Moreover, the Examiner's conclusion that it would be "obvious to modify the Ansuini device" in view of Agarwala is simply nothing more than a hindsight reconstruction taking what the Examiner perceives to be disclosed in Ansuini and modifying it by what the Examiner perceives to be disclosed in Agarwala. Because there is no "reason" or "motivation" for combining these two references, the combination does not meet the test of obviousness set forth by the U.S. Court of Appeals for the Federal Circuit.

Claims 13-15, 20 and 22 stand rejected under 35 USC §103 as unpatentable over Ansuini in view of Glass (U.S. Patent 5,437,773). Inasmuch as claims 13-15, 20 and 22 ultimately depend from claim 1, the above comments distinguishing claim 1 from the Ansuini reference are herein incorporated by reference.

The Examiner admits that "Ansuini does not disclose a platinum resistance thermometer for measuring a temperature where the microsensor is mounted. Ansuini also does not disclose that the corrosive tracks are made of a metallic alloy or an aluminum alloy. Ansuini does not disclose sputtering as the means for depositing the thin film onto the substrate." These admissions are very much appreciated.

While the Examiner suggests that Glass teaches the material admitted not to be included in Ansuini, the Examiner does not allege that Glass teaches or discloses Applicants' claimed "**plurality of corrosive tracks** electrically connecting said at least **two common terminals**." Thus, even if Ansuini and Glass otherwise taught what the Examiner alleges, the failure of either reference to teach the claimed "plurality of corrosive tracks electrically connecting said at least two common terminals" evidences the lack of obviousness in view of the Ansuini and Glass combination.

Moreover, the Examiner's conclusion that it would be "obvious to modify the Ansuini device" in view of Glass is simply nothing more than a hindsight reconstruction taking what the Examiner perceives to be disclosed in Ansuini and modifying it by what the Examiner perceives to be disclosed in Glass. Because there is no "reason" or "motivation" for combining these two references, the combination does not meet the test of obviousness set forth by the U.S. Court of Appeals for the Federal Circuit.

Claims 16-19 stand rejected under 35 USC §103 as unpatentable over Ansuini/Glass in view of Kordecki. Inasmuch as claims 16-19 ultimately depend from claim 1, the above comments distinguishing claim 1 from the Ansuini reference are herein incorporated by reference.

The Examiner admits that "Ansuini/Glass do not disclose that the apparatus comprises a metallic alloy that share a metal with the alloy of the track. Ansuini/Glass also do not disclose a second metallic component composed of a metallic alloy and a second metallic microsensor with a metallic alloy track. Ansuini/Glass also do not disclose that the proportion of the alloying constituent in the track alloy is similar to the alloying constituent of the bulk alloy to within 3% or to within 1% of the total constituents of the bulk alloy." These admissions are very much appreciated.

While the Examiner suggests that Kordecki teaches the material admitted not to be included in Ansuini/Glass, the Examiner does not allege that Kordecki teaches or discloses Applicants' claimed "**plurality of corrosive tracks** electrically connecting said at least **two common terminals**." Thus, even if Ansuini/Glass and Kordecki otherwise taught what the Examiner alleges, the failure of either reference to teach the claimed "plurality of corrosive tracks electrically connecting said at least two common terminals" evidences the lack of obviousness in view of the Ansuini/Glass and Kordecki combination.

Moreover, the Examiner's conclusion that it would be "obvious to modify the modified Ansuini/Glass device" in view of Kordecki is simply nothing more than a hindsight reconstruction taking what the Examiner perceives to be disclosed in Ansuini/Glass and modifying it by what the Examiner perceives to be disclosed in Kordecki. Because there is no "reason" or "motivation" for combining these two references, the combination does not meet the test of obviousness set forth by the U.S. Court of Appeals for the Federal Circuit.

Claim 21 stands rejected under 35 USC §103 as unpatentable over Ansuini/Glass in view of Glass (U.S. Patent 5,409,859). Inasmuch as claim 21 ultimately depends from claim 1, the

above comments distinguishing claim 1 from the Ansuini/Glass references are herein incorporated by reference.

The Examiner's admission that "Ansuini/Glass ('773) do not disclose annealing the thin film on to the substrate to encourage metallic grain growth" is very much appreciated. While the Examiner suggests that Glass '859 teaches the material admitted not to be included in Ansuini/Glass '773, the Examiner does not allege that Glass '859 teaches or discloses Applicants' claimed "**plurality of corrosive tracks** electrically connecting said at least **two common terminals**." Thus, even if Ansuini/Glass '773 and Glass '859 otherwise taught what the Examiner alleges, the failure of either reference to teach the claimed "plurality of corrosive tracks electrically connecting said at least two common terminals" evidences the lack of obviousness in view of the Ansuini/Glass '773 and Glass '859 combination.

Moreover, the Examiner's conclusion that it would be "obvious to modify the modified Ansuini/Glass ('773) device" in view of Glass '859 is simply nothing more than a hindsight reconstruction taking what the Examiner perceives to be disclosed in Ansuini/Glass '773 and modifying it by what the Examiner perceives to be disclosed in Glass '859. Because there is no "reason" or "motivation" for combining these two references, the combination does not meet the test of obviousness set forth by the U.S. Court of Appeals for the Federal Circuit.

In view of the above, it is clear that not only is there no single prior art reference that teaches a **plurality of corrosive tracks electrically connecting the two common terminals**, this missing structure is not shown in any combination of cited prior art references. As a result, there is no basis for rejecting amended claim 1 or claims dependent thereon under 35 USC §103 and any future rejection thereunder is respectfully traversed.

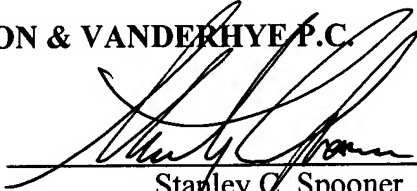
HARRIS et al.  
Appl. No. 10/529,227  
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Having responded to all objections and rejections set forth in the outstanding Official Action, it is submitted that amended claims 1-22 are in condition for allowance and notice to that effect is respectfully solicited. In the event the Examiner is of the opinion that a brief telephone or personal interview will facilitate allowance of one or more of the above claims, he is respectfully requested to contact Applicants' undersigned representative.

Respectfully submitted,

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